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6 *Attorneys for Plaintiff*
7 and the alleged Class

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 **NEIGHBORHOOD NEUROPATHY**
11 **CENTER OF RENO LLC,**
individually and on behalf of all others
similarly situated,

12 Plaintiff,

13 v.

14 **MEDRISK LLC**

15 Defendant.

Case No. 3:19-cv-00619-LRH-WGC

16 **RENEWED JOINT PROPOSED**
DISCOVERY PLAN AND
REQUEST FOR NEW
SCHEUDLING ORDER

17 Plaintiff Neighborhood Neuropathy Center of Reno LLC (“Plaintiff”) and
18 Defendant MedRisk LLC (“Defendant” or “MedRisk”) jointly submit this Renewed
19 Joint Proposed Discovery Plan and Request for New Scheduling Order. The Court
20 recently denied, on January 6, 2021, Defendant’s Motion for Summary Judgment,
21 which was filed approximately one month after the initial Discovery Hearing was
22 held in this case. (See Dkts. 19, 20, 26.) The Parties have subsequently met-and-
23 conferred and jointly submit the following proposed case schedule now that the
24 Motion for Summary Judgment has been denied:

25 Discovery Cut-off: August 23, 2021

26 Initial Expert Disclosure/Reports: June 23, 2021

1 Rebuttal Expert Disclosure/Reports: July 23, 2021

2 Motion for Class Certification: September 23, 2021

3 Subsequent Case Management Conference: TBD, to be set after a ruling on
4 class certification. The Parties propose that a subsequent case management
5 conference be set after a decision is made on class certification to establish
6 deadlines for the remainder of the case, including dispositive motions, pre-trial, and
7 trial.¹

8

9 Respectfully submitted,

10 Dated: January 22, 2021

11 **Neighborhood Neuropathy Center of Reno**
12 **LLC**, individually and on behalf of all others
13 similarly situated,

14 By: /s/ Taylor T. Smith
15 One of Plaintiff's Attorneys

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25 ¹ Defendant reserves all rights to move to limit the scope of discovery, and/or to bifurcate class
26 and merits discovery. Defendant will meet and confer with Plaintiff prior to requesting any such
relief from the Court.

1 Facsimile: (303) 927-0809
2

3 Attorneys for Plaintiff and the Class
4

5 * Pro Hac Vice
6

Dated: January 22, 2021

MedRisk, LLC

7 By: /s/ Joel E. Tasca
8 One of Defendant's Attorneys
9

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19 **IT IS SO ORDERED**
20

21 
22 **UNITED STATES MAGISTRATE JUDGE**
23

24 **DATED: January 25, 2021**
25